

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	RM-10811
Amateur Service Rules to Revise Examination)	
Requirements and Improve Testing Standards)	
)	

To: The Commission

COMMENT

1. I urge the Commission to accept the Petition for Rulemaking RM-10811, which was submitted by FISTS CW Club.

2. The Amateur Radio Service must remain a skilled, technical service — not become another Personal Radio Service.

3. Morse code remains essential to the Amateur Radio Service to fulfill its *Basis and Purpose* as delineated under §97.1 of the rules of the Federal Communications Commission, 47 CFR (*particularly with respect to providing emergency communications*).

4. The capability to send and receive Morse code is retained in the U.S. military service, is still being trained in military schools and is in use today in various military theaters throughout the world. *“The performance standard for success is 13 code groups per minute. This would not be required or trained if it were not an absolute neccessity. Training time is at a premium and unneeded skills are not maintained as requirements for army specialties.”*¹

5. Instant retesting of exam elements is not in the best interest of the Amateur Radio Service.

6. It is not in the best interest of the Amateur Radio Service to delegate areas of content for examination. The Commission should reinstate a syllabus of topics for the technical requirements for licensing.

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¹ G.I. Joe and Mr. Morse by Lt. Col. Bart J. Hill, K7LTC. August 2003, 73 Amateur Radio Today magazine, 70 Hancock Rd., Peterborough, NH 03458-1107.